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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
AT WINCHESTER, TN.

FILED

JUN 13 2013

Clerk, U. S. District Court  
Eastern District of Tennessee  
At Chattanooga

LAWRENCE C. BURRHUS II  
42 MAPLE LANE  
PELHAM, TENNESSEE 37366  
931-636-6812

v.

CASE # 4:13-cv-37

*Mattice / Lee*

HOMEWARD RESIDENTIAL INC. FORMERLY KNOWN AS  
AMERICAN HOME MORTGAGE SERVICING INC.  
1525 S. BELTLINE ROAD  
COPPELL, TEXAS 75019-4913

QBE INSURANCE CORPORATION  
88 PINE STREET 16TH FLOOR  
NEW YORK, NEW YORK 10005

CT CORPORATION SYSTEM  
1515 MARKET STREET SUITE 1210  
PHILADELPHIA, PENNSYLVANIA 19102

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G. MOSS AND ASSOCIATES, L.L.P.

6560 GREENWOOD PLAZA BLVD. SUITE 100

ENGLEWOOD, COLORADO 80111-7100

### COMPLAINT

Homeward Residential Inc. formerly known as American Home mortgage Servicing Inc. attempted to place flood insurance on our home far in excess of the loan balance. They also attempted to back date said policy to September 25, 2009 when the required premium was not paid until May 24, 2010. They also attempted to force place an escrow account for the flood insurance only. They also continually harrassed and threatened both myself and my wife to such a point that my wife suffered a stroke from the mental anguish that she was enduring. And I was fired from my job which I had been performing successfully in excess of 5 years. This resulted in extreme hardship because of the loss of income and loss of opportunity.

QBE Insurance Corporation and it's employees caused an insurance binder to be placed far in excess of the balance of the loan. And they back dated said binder to September 25, 2009 when they did not receive the premium on the policy until May 24, 2010.

CT Corporation System and it's employees are the parent company of QBE Insurance Corporation.

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G. Moss and Associates L.L.P. And it's employees issued many threats to foreclose on our property. They did this in spite of the fact that the principle and interest was paid faithfully every month. This caused my wife great mental anguish and caused me extreme anger. The reason for my anger was that this professional law corporation did not have anyone capable of researching the law to check the legality of their actions.

Therefore with all of these actions Homeward Residential formerly known as American Home Mortgage Servicing Inc. and it's employees directly violated THE NATIONAL FLOOD INSURANCE ACT OF 1968 specifically 42 USC 4012a, 42 USC 4012d and 2 USC 4013c 1&2 A&B. They also violated THE FLOOD DISASTER PROTECTION ACT OF 1973 specifically 42 USC 4012a, 42 USC 4012d, and 42 USC 4013c 1&2 A&B. They also violated THE RIEGLE COMMUNITY DEVELOPMENT AND REGULATORY IMPROVEMENT ACT OF 1994 specifically Section 522(1), 523, and 579. And THE FLOOD INSURANCE REFORM ACT OF 2004 specifically Section 552c 1&2. And last but certainly not least the codes forbidding harrassment, intimidation, and threatening, loss of income, and loss of oportunity, mental anguish and I have no idea what codes those are.

QBE Insurance Corporation violated many of the same codes.

And G. Moss and Associates as officers of the court failed to uphold the laws that they were sworn to uphold. They merely did what their client told them to do and did not research the legality of what they were told to do.

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I am and was a citizen in good standing and my wife was a citizen in good standing of the State of Tennessee and the County of Grundy. The home is located in Grundy County within the State of Tennessee. Homeward Residential formerly known as American Home Mortgage Servicing Inc. and its employees are not residents of the State of Tennessee, therefore this court has jurisdiction over this case.

Plaintiff, Lawrence C. Burrhus II resides at 42 Maple Lane, Pelham, Grundy County, Tennessee 37366, Phone # 931-636-6812.

Defendant, Homeward Residential Inc. formerly known as American Home Mortgage Servicing Inc. operates a business at 1525 S. Beltline Road, Coppell, Dallas County, Texas, 75019-4913

Defendant, QBE Insurance Corporation operates a business at 88 Pine Street 16<sup>th</sup> Floor New York, Manhattan, New York 10005.

Defendant, CT Corporation System operates a business at 1515 Market Street, Philadelphia, Philadelphia County, Pennsylvania, 19102

Defendant, G. Moss and Associates, L.L.P. , operates a business at 6560 Greenwood Plaza Blvd. Suite 100, Englewood, Arapahoe County, Colorado, 80111-7100.

I am asking this court for relief in the form of lost wages, loss of opportunity, medical expenses pertaining to the stroke that my wife suffered, mental anguish, and punitive damages.

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I am asking for an amount that will cause these companies to think long and hard before they attempt these illegal activities again. And I believe that this court should recommend to the U.S. Attorney that an investigation be opened into these actions. I believe that if they attempted this with me that they probably did it to others as well.

I hereby certify under penalty of perjury that the above complaint is true to the best of my information, knowledge and belief.

Signed this JUNE day of 13, 2013

  
  
Signature of Plaintiff

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